

# EXHIBIT 4

**From:** Mills, David  
**Sent:** Monday, September 16, 2019 4:40 PM  
**To:** Kavanaugh, Christopher (USAVAW)  
**Cc:** Grooms, Daniel; Siegel, Joshua  
**Subject:** Sines v. Kessler, No. 3:17-cv-00072 (W.D. Va.) - Touhy Request  
**Attachments:** Touhy Letter to Hon. T. Cullen.pdf; Subpoena to Brent Meyers\_FBI.pdf; Subpoena to T. Cullen\_USAO.pdf

Chris – As we discussed, now that James Fields has been sentenced in federal and state court, we’d like to obtain certain evidence relevant to the issues in our civil case against him and others. Attached is a *Touhy* request with related subpoenas. We’re sending to you for input on the most efficient and least disruptive way to handle this process. We are happy to discuss at your convenience. Regards. – David

**David E. Mills**

Cooley LLP  
1299 Pennsylvania Avenue, NW • Suite 700  
Washington, DC 20004-2400  
Direct: +1 202 776 2865 • Fax: +1 202 842 7899 • Cell: +1 202 413 8964  
Email: [dmills@cooley.com](mailto:dmills@cooley.com)  
Bio: [www.cooley.com/dmills](http://www.cooley.com/dmills) • Practice: [www.cooley.com/litigation](http://www.cooley.com/litigation)